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*Co-Lead Counsel for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:  
  
ALL ACTIONS

**DECLARATION OF LEXI J. HAZAM IN  
SUPPORT OF AMENDED  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER THE META  
DEFENDANTS' MATERIALS SHOULD  
BE SEALED (MASTER COMPLAINT)**

I, Lexi Hazam, declare and state as follows:

1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP and Co-Lead Counsel for Plaintiffs in this action. I am a member in good standing of the State Bar of California. I make this declaration based on my own personal knowledge. If called upon to

1 testify, I could and would testify competently to the truth of the matters stated herein.

2           2.       I submit this declaration, as required by Civil Local Rule 7-11, regarding  
3 Plaintiffs' Amended Administrative Motion Consider Whether the Meta Defendants' Materials  
4 Should be Sealed.

5           3.       Plaintiffs' Master Complaint contains and refers to materials from the Meta  
6 Defendants which Plaintiffs have agreed to treat as highly confidential until a protective order is  
7 entered by the Court and the Meta Defendants have formally designated the materials under that  
8 protective order. Plaintiffs take no position at this time on whether any of the materials satisfy the  
9 requirements for filing under seal.

10           4.       As required by Civil Local Rule 79-5, Plaintiffs are filing redacted version of the  
11 Master Complaint on the public docket. Unredacted versions attached to this motion under seal  
12 contain highlighting to indicate where redactions are proposed.

13           I declare under penalty of perjury that the foregoing is true and correct. Executed on  
14 February 17, 2023, in San Francisco, CA.

15                               /s/ Lexi J. Hazam  
16                               Lexi J. Hazam  
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